



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

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JUL 30 2012

Ref: 8EPR-N

Ms. Pamela Murdock
Bureau of Land Management
Rawlins Field Office
1300 North Third
P.O. Box 2407
Rawlins, Wyoming 82301

Re: Chokecherry and Sierra Madre Wind Energy
Project Final Environmental Impact
Statement, CEQ#20120204

Dear Ms. Murdock:

The U.S. Environmental Protection Agency (EPA) Region 8 has reviewed the Final Environmental Impact Statement (EIS) prepared by the Bureau of Land Management for the Chokecherry and Sierra Madre Wind Energy Project. Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(c), and Section 309 of the Clean Air Act (CAA), 42 U.S.C. Section 7609.

The EIS evaluates the proposal by The Power Company of Wyoming to construct and operate a wind energy project south of Rawlins in Carbon County, Wyoming. The proposed project would consist of two wind farm sites, the Chokecherry site and the Sierra Madre site, located approximately nine miles apart. The total acreage of the two sites is 222,689 acres, including private, state and federal land.

Our review noted changes to the project compared to the Draft EIS that result in improved air quality. Specifically, the peak year net disturbed acres have been reduced from 5,156 acres in the Draft EIS to 2,219 acres in the Final EIS and this change significantly decreases projected air emissions.

The EPA appreciates the BLM's responses to our October 17, 2011 Draft EIS comments and the additional information that BLM provided regarding the dispersion modeling that was used to assess PM₁₀ impacts of haul truck emissions and dirt roads. Please note for future projects, EPA suggests using updated dispersion models such as AERSCREEN or AERMOD in place of the older SCREEN3 model, and we recommend including the modeling results in the EIS. Given that the Final EIS estimates fugitive dust emissions to be 2,663 tons PM₁₀ and 1,038 tons PM_{2.5} in the maximum emission year, which is a substantial amount of dust, and the level of impact from these emissions is not disclosed in

the Final EIS, we continue to recommend that the BLM periodically monitor dust emissions (opacity) and increase the frequency of dust control, or change dust control methods if needed. Our recommendation reflects the fact that fugitive dust can be a human health concern.

In our Draft EIS comments, we identified potential additional mitigation including resin treatments (84% control efficiency), paving the roads (99% control efficiency), or contingency plans such as ceasing construction activities when wind speeds are greater than 30 mph. We also recommended including a monitoring and mitigation threshold provision, for example: limit visible dust emissions to 20% opacity by watering, graveling, phasing of work, applying water during active operations or applying chemical treatments to the unpaved roads. The BLM's response to comments received on the Draft EIS indicates that the applicant committed measures are anticipated to limit visible dust emissions to 20% opacity. To ensure this important limitation is achieved, we recommend that BLM include a commitment in the ROD to apply additional mitigation if visible dust emissions are found to exceed 20% opacity or if fugitive dust impacts are otherwise determined to be more severe than anticipated.

If you have any questions or would like to discuss our comments, please contact me at (303) 312-6925. You may also contact Molly Vaughan, lead reviewer for this project at (303) 312-6577 or by email at vaughan.molly@epa.gov.

Sincerely,



Suzanne J. Bohan

Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

